

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to:

Bakahityar Kamardinova et al. v. Islamic Republic of Iran, No. 1:18-cv-05339 (GBD) (SN)

**THE KAMARDINOVA PLAINTIFFS' NOTICE OF MOTION FOR
PARTIAL FINAL JUDGMENT II**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Jerry S. Goldman, Esq., (“Goldman Declaration”), along with the exhibits appended, certain plaintiffs in the above-referenced matter who are identified on Exhibit A to the Goldman Declaration, by and through their counsel, Anderson Kill P.C., respectfully move this Court for an Order awarding them: (1) judgment as to damages in the same amounts previously awarded by this Court to various similarly situated plaintiffs in *Burnett*, *Havlish*, *Ashton*, *Bauer*, and other cases; (2) compensatory damages for pain and suffering in the same per estate amount previously awarded by this Court regarding other estates of decedents killed in the September 11th attacks; (3) in the case of plaintiff George Kane, as the Personal Representative of the Estate of Jennifer L. Kane, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Jennifer L. Kane, an award of economic damages in the amount of \$2,650,230; (4) prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001, until the date of the judgment for damages; and (5) permission for plaintiffs to submit an application for punitive damages, economic damages, or other damages (to the extent such awards have not previously been ordered) at a later date consistent with any future rulings made by this Court on this issue.

Plaintiffs' request is made in connection with the judgment on default as to liability entered against the Islamic Republic of Iran on June 21, 2019. *In re Terrorist Attacks on September 11, 2001*, No. 03-md-1570, ECF 4596.

Respectfully submitted,

/s/ Jerry S. Goldman

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Dated: August 20, 2019
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